

E-filed 5/1/07

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Attorneys for Plaintiff and Specially-Appearing
 Counter-Defendant M. DIANE KOKEN

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN JOSE DIVISION

M. DIANE KOKEN,
 Plaintiff,

v.

STATECO INC. d/b/a STATECO
 INSURANCE SERVICES and THOMAS
 NATOLI, and XYZ CORPS. 1-10, and DOES
 1 through 10, inclusive,
 Defendants.

Case No.: 5:05-cv-03007-JF

**STIPULATION AND [PROPOSED]
 ORDER CONTINUING HEARING
 ON PLAINTIFF'S MOTION TO
 DISMISS DEFENDANTS' SECOND
 AMENDED COUNTERCLAIM**

AND RELATED CROSS-ACTION

Plaintiff and Specially Appearing Counter-Defendant M. Diane Koken ("Plaintiff")
 and Defendants and Counter-Claimants Stateco Inc., doing business as Stateco
 Insurance Services, and Thomas Natoli (collectively "Defendants") by and through their
 undersigned counsel, stipulate as follows:

1. WHEREAS Defendants filed their Second Amended Counterclaim on or
 about May 2, 2006; and

2. WHEREAS Plaintiff filed her Motion to Dismiss Second Amended

1 Counterclaim of Defendants on or about February 1, 2007; and

2 3. WHEREAS the hearing on Plaintiff's motion was scheduled for May 4,
3 2007; and

4 4. WHEREAS because Plaintiff's counsel will be out of the country, Plaintiff
5 requested, and Defendants agreed to, a continuance of the hearing date; and

6 5. WHEREAS the extension requested by Plaintiff will not affect any court-
7 ordered deadlines;

8 IT IS PROPOSED AND STIPULATED:

9 The hearing date on Plaintiff's Motion to Dismiss Second Amended Counterclaim
10 of Defendants shall be continued to June 15, 2007 at 9:00 a.m.

11 IT IS SO STIPULATED.

12
13 DATED: April 26, 2007

BERLINER COHEN

14
15 By Laura Palazzolo
16 Laura Palazzolo
17 Attorneys for Defendants and Counter-
18 Claimants STATECO INC., dba STATECO
INSURANCE SERVICES and THOMAS
NATOLI

19 DATED: April _____, 2007

SCHIFF HARDIN LLP

20
21 By _____
22 Wilson K. Park
23 Attorneys for Plaintiff and Specially
24 Appearing Counter-Defendant M. DIANE
25 KOKEN
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STIPULATION AND [PROPOSED] ORDER CONTINUING HEARING ON PLAINTIFF'S MOTION TO DISMISS DEFENDANTS'
SECOND AMENDED COUNTERCLAIM

1 Counterclaim of Defendants on or about February 1, 2007; and

2 3. WHEREAS the hearing on Plaintiff's motion was scheduled for May 4,
3 2007; and

4 4. WHEREAS because Plaintiff's counsel will be out of the country, Plaintiff
5 requested, and Defendants agreed to, a continuance of the hearing date; and

6 5. WHEREAS the extension requested by Plaintiff will not affect any court-
7 ordered deadlines;

8 IT IS PROPOSED AND STIPULATED:

9 The hearing date on Plaintiff's Motion to Dismiss Second Amended Counterclaim
10 of Defendants shall be continued to June 15, 2007 at 9:00 a.m.

11 IT IS SO STIPULATED.

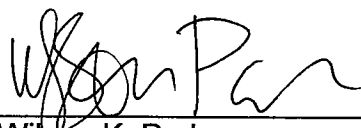
12
13 DATED: April ____, 2007

BERLINER COHEN

14
15 By _____
16 Laura Palazzolo
17 Attorneys for Defendants and Counter-
18 Claimants STATECO INC., dba STATECO
INSURANCE SERVICES and THOMAS
NATOLI


19 DATED: April 21, 2007

SCHIFF HARDIN LLP

20
21 By  _____
22 Wilson K. Park
23 Attorneys for Plaintiff and Specially
24 Appearing Counter-Defendant M. DIANE
25 KOKEN
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IT IS SO ORDERED

DATED: May 1, 2007

By 
Honorable Jeremy Fogel
United States District Court Judge